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GOVERNMENT OF PUERTO RICO PUBLIC SERVICE REGULATORY BOARD PUERTO RICO ENERGY BUREAU

IN RE: CASE NO.: NEPR-MI-2021-0004

REVIEW OF LUMA'S INITIAL BUDGET

SUBJECT: Urgent Request for Extension of Time to Submit Response in Compliance with Order of May 23, 2023.

URGENT REQUEST FOR EXTENSION OF TIME TO SUBMIT RESPONSE IN COMPLIANCE WITH ORDER OF MAY 23, 2023 AND REQUEST OF CLARIFICATION OF ORDER

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR, LLC ("Genera"), through its counsel of record, and respectfully state and request the following:

- 1. On May 23, 2023, this Energy Bureau issued a Resolution and Order with the subject Second Requirement of Information ("ROI") Review of LUMA's Proposed Consolidated FY2024 Budgets. ("May 23 Order"). In its pertinent part, this Energy Bureau ordered LUMA, Genera PR, and PREPA to respond, on or before June 2, 2023 at 12:00 PM, to a Second Requirement of Information ("ROI") set forth in Attachment A and Attachment B to the May 23 Order.
- 2. Genera PR has been relentlessly pursuing compliance with the May 23rd Order, substantiating its commitment through *its Motion Submitting Responses to ROIs in Compliance with May 23 Order* filed on June 2, 2023 (. However, considering the requisite accuracy and completeness for the Second Request for Information ("ROI") issued by the Energy Bureau, Genera PR finds it necessary to request an extension of time to respond to items 51, 57 and 60. Thus, we respectfully ask this Energy Bureau for an extension until the end of the business day on Tuesday, June 6, 2023, to thoroughly prepare and submit the remaining responses.

3. Moreover, due to various interpretations of the procedure for filing Genera PR documentation directly through LUMA, Genera PR respectfully requests clarification on whether it is permitted to file any additional documents directly before this Bureau, without LUMA's assistance.

WHEREFORE, Genera respectfully requests that the Energy Bureau take notice of the above, grant the request for extension and, additionally, clarify the order regarding the filing of Genera PR response on the May 23, 2023.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 2nd day of June 2023.

ECIJA SBGB

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s/ Jorge Fernández-Reboredo Jorge Fernández-Reboredo jfr@sbgblaw.com TSPR 9,669

s/ Alejandro López-RodríguezAlejandro López-Rodríguezalopez@sbgblaw.comTSPR 22,996

CERTIFICATE OF SERVICE

We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System and that we will send an electronic copy of this motion to the attorney for Puerto Rico's Electric Power Authority (PREPA), Joannely Marrero-Cruz, at jmarrero@diazvaz.law; and Maralíz Vázquez-Marrero, at mvazquez@diazvaz.law.

In San Juan, Puerto Rico, this 2nd day of June 2023

<u>s/ Jorge Fernández-Reboredo</u>
Jorge Fernández-Reboredo